

	Page 2		Page 3
1	APPEARANCES	1	TABLE OF CONTENTS
2		2	PAGE
3	ANDREW C. CLARKE	3	
4	Attorney at Law		Title Page..... 1
5	6256 Poplar Avenue	4	
6	Memphis, Tennessee 38119		Appearance Page..... 2
7	901.680.9777	5	
8	aclarke@accfirm.com		Table of Contents..... 3
9	Counsel for Plaintiff	6	
10	MARY MCKAY GRIFFITH		Exhibit Index..... 4
11	DANIEL "DANNY" GRIFFITH	7	
12	Jacks Griffith Luciano		EXAMINATION OF BRYANT GRIFFIN
13	150 North Sharpe Avenue	8	
14	Cleveland, Mississippi 38732		By Mr. Clarke..... 5
15	662.843.6171	9	By Ms. Riley..... 62
16	mgriffith@jlpalaw.com	10	By Ms. Griffith..... 76
17	dgriffith@jlpalaw.com		By Mr. Clarke..... 76
18	Counsel for Defendants	11	By Ms. Riley..... 82
19	KATELYN A. RILEY		By Mr. Clarke..... 82
20	Allen, Allen, Breeland & Allen	12	
21	Post Office Box 751		Reporter's Certificate..... 85
22	Brookhaven, Mississippi 39601	13	Deponent's Certificate..... 86
23	601.833.4361	14	
24	kriley@sabalegal.com	15	Correction Sheet..... 87
25	Counsel for Defendant Bryant Griffin	16	
		17	
		18	
		19	
		20	
		21	
		22	
		23	
		24	
		25	

	Page 4		Page 5
1	EXHIBIT INDEX	1	BRYANT GRIFFIN,
2		2	having been first duly sworn,
3	NO. DESCRIPTION PAGE	3	was examined and testified as follows:
4	1 Responses to Interrogatories 13	4	EXAMINATION
5	2 Responses to Requests for Production of Documents 13	5	BY MR. CLARKE:
6	3 Professional Certificate, Part-Time Law Enforcement Officer 15	6	Q. Would you please state your name?
7	4 Note to Produce Police Training Certificate 16	7	A. My name is Bryant O'Neal Griffin, Sr.
8		8	Q. And where do you live?
9		9	A. I live here in Grenada, for 51 years. All my life. 110 Sunflower Drive, Grenada, Mississippi.
10		10	Q. And have you ever given a deposition before?
11		11	A. No, sir.
12		12	Q. Okay. Because you haven't given a deposition, I want to go over some ground rules. Okay?
13		13	A. Okay.
14		14	Q. Obviously you're under oath here, and your testimony is subject to the penalty of perjury. You understand that?
15		15	A. Yes, sir.
16		16	Q. A lot of times when we get into a conversation with people, you know, we anticipate what they're going to say and start answering
17		17	
18		18	
19		19	
20		20	
21		21	
22		22	
23		23	
24		24	
25		25	

RICHARD WORLEY V. DEPUTY DANNY LAWRENCE, ET AL.
Bryant Griffin - 08/15/2018

Pages 34..37

Page 34

1 MS. GRIFFITH: Object to the form.
2 MR. CLARKE CONTINUED:
3 **Q. All right. Now, once -- okay. So what**
4 **all did Strider say when you told him that?**
5 A. He told me I can't be using that kind of
6 force on a handcuffed person. And I told him I
7 understand. Now I do.
8 **Q. Did he fire you?**
9 A. No. He laid me off. I been laid off ever
10 since it happened.
11 **Q. So you've been laid off since 12/24/16?**
12 A. Yes, sir.
13 **Q. All right. Have you gone to any other**
14 **training or anything since then?**
15 A. No, sir.
16 **Q. Did you get any paperwork saying you were**
17 **laid off?**
18 A. No, sir.
19 **Q. He just told you, "We don't need you until**
20 **this lawsuit's over"?**
21 A. Yes, sir.
22 **Q. Did you have any type of -- did he say,**
23 **"We're going to investigate this through internal**
24 **affairs" or anything?**
25 MS. GRIFFITH: Object to the form.

Page 36

1 **hit him?**
2 A. No, sir.
3 **Q. Did you talk to Randy Sweat about that?**
4 A. I told Randy I had to punch him two or
5 three times.
6 **Q. And where was Deputy Lawrence when you**
7 **punched him?**
8 A. I can't -- I can't remember. I think he
9 was on the other side of the truck. He was letting
10 the door down.
11 **Q. Of the sally port?**
12 A. Yeah.
13 **Q. Where was Officer -- Deputy Sweat?**
14 A. I think he was behind me.
15 **Q. Did you hear -- did you say anything to**
16 **Mr. Worley during this time?**
17 A. I told him -- I told him to calm down.
18 **Q. All right. Did Mr. Worley say anything to**
19 **you?**
20 A. Yes, sir.
21 **Q. Did he say anything to you before you**
22 **punched him the first time?**
23 A. Yes, sir. He told me don't touch him.
24 **Q. And after you hit him the first time, then**
25 **did he say anything?**

Page 35

1 THE WITNESS: No, he didn't tell me
2 nothing about that.
3 MR. CLARKE CONTINUED:
4 **Q. Did you have to talk to anybody else about**
5 **what happened?**
6 A. No more than. . .
7 **Q. Not your lawyers. Did you speak to your**
8 **lawyers at any time?**
9 A. No, sir.
10 **Q. I'm not asking you any conversations with**
11 **that. I'm talking about people from Grenada.**
12 A. No, sir.
13 **Q. All right. Danny Lawrence, tell me what**
14 **he knows about this case that you're aware of.**
15 A. Everything I just told you, that I -- that
16 I'm aware of.
17 **Q. So Danny Lawrence was there when you**
18 **punched him three times?**
19 A. Was he there?
20 **Q. Yeah. Was he in the sally port?**
21 A. Yes, sir.
22 **Q. Did he see it?**
23 A. I don't know if he seed it or not, but he
24 was in the sally port.
25 **Q. Did you ever talk to him about that you**

Page 37

1 A. He started cussing.
2 **Q. Okay. Did he --**
3 A. Calling me the N word and, "I'm going to
4 kill you." Told me he's going to make me suck his
5 private part before he killed me.
6 **Q. All right. And then you hit him again,**
7 **right?**
8 A. Not because of that.
9 **Q. I'm just going chronologically.**
10 A. I hit him again because he was still
11 trying to come at me and bite me.
12 **Q. All right. I'm not asking you that. I'm**
13 **asking the chronology. Before you hit him the**
14 **first time, he said, "Don't touch me," correct?**
15 A. Yes, sir.
16 **Q. After that, he cussed you, called you the**
17 **N word, told you he was going to kill you, and he**
18 **was going to make you suck his dick?**
19 A. Yes, sir.
20 **Q. And then you hit him again, correct?**
21 A. No, sir. After he came at me and tried to
22 bit me again, that's when I hit him again the
23 second time. And after I spun him around, he
24 tried to kick me in my groin, and I hit him a third
25 time.

RICHARD WORLEY V. DEPUTY DANNY LAWRENCE, ET AL.
Bryant Griffin - 08/15/2018

Pages 38..41

<p style="text-align: right;">Page 38</p> <p>1 Q. I'm trying to just -- my question is 2 asking you -- we already -- I already understand 3 you allege that he tried to bite you. Okay. I'm 4 trying to find out anything that was said in 5 between the three punches. Okay? The first one, 6 before you hit him the first time, he said, "Don't 7 touch me," correct? 8 A. Yes, sir. 9 Q. Before you hit him the second time, he 10 called you the N word. He told you -- he said he 11 was going to make you suck his dick, and -- 12 A. Well, after -- after that, he just 13 repeated the same thing over and over. 14 Q. Okay. 15 A. "I'm going to kill you, nigger. Before I 16 kill you, you're going to suck me." And he just 17 kept saying the same thing over and over. 18 Q. And you hit him again? 19 A. Yeah. After he tried to kick me, I hit 20 him again. 21 Q. Well, no, I'm -- let's break this down. 22 First punch, before you hit him the first time, he 23 said, "Don't touch me." 24 A. Yeah. Before I even hit him the first 25 time, he told me don't touch him.</p>	<p style="text-align: right;">Page 39</p> <p>1 Q. And then you say he tried to bite you, and 2 you hit him in the face? 3 A. Yes, sir. 4 Q. Okay. Then after you hit him in the face, 5 then he started saying -- 6 A. Cursing and -- 7 Q. Cursing and saying the N word? 8 A. Yes, sir. 9 Q. Saying he was going to make you suck his 10 dick? 11 A. Yes. 12 Q. And you hit him again, correct? 13 A. Yes, sir. 14 Q. And then you turned him to the side? 15 A. Yes, sir. 16 Q. Turned him to get him out of the truck, 17 his seat? 18 A. Get him out of the truck. 19 Q. And did he say anything? Was he still 20 saying the same thing? 21 A. Still saying the same thing. 22 Q. Still saying the same thing. 23 MS. GRIFFITH: Object to the form. I 24 think, just for clarification, during all of this, 25 he was threatening to kill him. I'm not sure he</p>
<p style="text-align: right;">Page 40</p> <p>1 said that. 2 MR. CLARKE: That's -- you can object 3 to the form, but. . . 4 MS. GRIFFITH: Okay. Thanks. 5 MR. CLARKE CONTINUED: 6 Q. And then he was saying those same things 7 again as you turned his legs around to get him out? 8 A. Yes, sir. 9 Q. And then you say he tried to kick you? 10 A. Yes, sir. 11 Q. And you punched him again in the face? 12 A. Yes, sir. 13 Q. All right. Now -- 14 A. I don't think he probably really meant 15 that he was going to kill me or nothing like that, 16 because he was intoxicated. I could smell the 17 alcohol beverage. As far as what he had to drink, 18 I couldn't tell you. 19 But, like, I know he probably was mad at 20 me because I -- you know, I hit him in the face. I 21 understand that. But, I mean, none of us would 22 have took no bite from nobody, you know. 23 Q. I mean, and if he didn't try to bite you, 24 then -- 25 A. If he wouldn't have never -- this ain't my</p>	<p style="text-align: right;">Page 41</p> <p>1 first time carrying somebody to jail. If wouldn't 2 have never tried to bite me, I wouldn't have never 3 hit him. I don't -- unloaded people at the sally 4 port before, I ain't never had no trouble. And I 5 worked every weekend. Every weekend. 6 Q. I understand. My guy says it didn't 7 happen. So. . . 8 A. Yeah. 9 Q. He said it didn't even happen there. So 10 we're going to get to that. 11 A. Yes. 12 Q. All right. But Danny Lawrence was, you 13 think, trying to close the sally port, but he was 14 in the sally port? 15 A. Yeah. He was in the sally port, but he 16 was on the other side of the truck. 17 Q. Randy Sweat was behind you? 18 A. Yes, sir, he was behind me. 19 Q. And to be clear, Mr. Worley did not bite 20 you and did not actually kick you? 21 A. No, sir. 22 Q. All right. Tim Gholston, you have him 23 down here. What does Tim Gholston know? Was he in 24 the sally port? 25 A. He was in the sally port, but he was in</p>

RICHARD WORLEY V. DEPUTY DANNY LAWRENCE, ET AL.
Bryant Griffin - 08/15/2018

Pages 42..45

<p style="text-align: right;">Page 42</p> <p>1 front of his pickup truck. He wasn't nowhere close 2 to me like Randy Sweat was. Randy Sweat was the 3 only one really close to me. 4 Q. Did he come to you or assist you in any 5 way in the sally port? 6 A. Who? Tim? 7 Q. Yeah. 8 A. Yeah. He come over there and, you know, 9 tried to break us up or whatever, get me away from 10 him. 11 Q. Did anybody tell you don't punch him? 12 A. They told me to stop. Yeah, they told me 13 to stop. 14 Q. Who told you to stop? 15 A. Tim Gholston, Randy Sweat. 16 Q. All right. Donny Willis, what does he 17 know about this? 18 A. Donny Willis wasn't out there. 19 Q. Do you know Donny Willis? 20 A. Yes, sir. 21 Q. Did you know that -- prior to you punching 22 Mr. Worley, do you know whether or not Mr. Worley 23 had said anything racially derogatory of Donny 24 Willis or Sonja Willis? 25 A. Not to my knowledge.</p>	<p style="text-align: right;">Page 43</p> <p>1 Q. So Donny Willis, you wrote him -- you 2 don't think he has any information about that? 3 A. I didn't put Donny down. 4 Q. Well, you did. You signed this. 5 A. Donny was not there. 6 Q. Okay. Well, I understand. And he was 7 named in the lawsuit, and that -- you may be just 8 putting him for that. But I'm just trying to ask 9 you what you know about these people. 10 A. Oh, I know both of them. 11 Q. Do you know -- 12 A. I went to school with both of them. 13 Q. Do you know Donny Willis -- do you know if 14 he has information pertaining to this incident? 15 A. To my case? 16 Q. Yeah. 17 A. I don't -- I don't know. 18 Q. Okay. Barbara Kitchens, do you know 19 anything about her? 20 A. No, sir. 21 Q. Marilyn Bibbs? 22 A. No, sir. 23 Q. Jamica Hankins? 24 A. No, sir. 25 Q. Linda Evans?</p>
<p style="text-align: right;">Page 44</p> <p>1 A. No, sir. 2 Q. Who is Linda Evans? 3 A. I don't know. 4 Q. Josephine Hubbard? 5 A. I don't know. 6 Q. Patricia Moody? 7 A. I don't know. 8 Q. Sonja Willis? 9 A. I know Sonja. 10 Q. Do you know if she knows anything -- have 11 you talked to her about this? 12 A. I haven't talked to her about this case, 13 and I don't know if she knows anything about it, 14 but she was not in the sally port neither. 15 Q. Richard Busby? 16 A. I don't know him. 17 Q. You don't even know who he is? 18 A. No, sir. 19 Q. Calvin Roach? 20 A. No, sir. 21 Q. All right. If we go to Interrogatory No. 22 10 -- it's on page 7. If you look at the 23 interrogatory number, it says, "Please state with 24 specificity and in chronological order the exact 25 sequence of events from the time that you became</p>	<p style="text-align: right;">Page 45</p> <p>1 aware of and/or involved in the incident involving 2 the plaintiff," who is Mr. Worley, "until you 3 completed your shift assignment and returned to 4 your home." Do you see that? 5 A. Uh-huh (affirmative response). 6 Q. All right. I want you to read over that 7 response here, and then I'm going to ask you some 8 questions about it. 9 A. (Reviewing document.) Okay. 10 Q. Based on what you've told me today, would 11 you agree that this interrogatory response is very 12 misleading? 13 A. Yeah, I agree with it. 14 Q. You agree that it's misleading, or you 15 agree -- 16 A. No, sir. I agree with it that it's right. 17 Q. Did you say in this interrogatory response 18 that you hit him ever? 19 A. I don't think I did. In the report, I 20 didn't. 21 Q. Well, you understand about half truths, 22 right? 23 A. Yes, sir. 24 Q. You know what this lawsuit was about. You 25 got a copy of the lawsuit, right?</p>